



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
AIR AND RADIATION

MEMORANDUM

May 1, 2000

TO: ENERGY STAR[®] Roof Products Program Partners

FROM: Rachel Schmeltz, Program Manager, U.S. Environmental Protection Agency
Steve Ryan, Program Manager, U.S. Environmental Protection Agency

RE: Final Determination on the two RCMA proposals to Amend the Current Memorandum of Understanding (MOU)

Below are EPA's final determinations pertaining to the two Roof Coatings Manufacturers Association (RCMA) proposals to amend the Current Memorandum of Understanding (MOU). Please note that EPA will post this document at the following URL: <http://www.epa.gov/appdstar/roofing/partsrce.htm>.

At the ENERGY STAR[®] Roof Products Program Partner meeting held at the National Roofing Contractors Association (NRCA) Annual Convention and Exhibit in Atlanta (February 2000), two proposals submitted by the RCMA were discussed. Specifically, RCMA proposed that EPA consider amending the current ENERGY STAR[®] Roof Products MOU to (1) incorporate the ASTM D2824 as an optional solar reflectance test method, and (2) incorporate accelerated weathering as an alternative to in-field measurements or samples of 3-year field weathering.

Both proposals were presented to, and discussed by the meeting attendees. Pursuant to the meeting, EPA received additional feedback from several participants. As follow up to the Atlanta meeting, EPA distributed summaries of the meeting and the additional feedback to Program Partners and other industry experts. The materials were distributed in late March and recipients were given another opportunity to comment by April 14, 2000. Only one additional comment was received.

After reviewing the proposals and comments submitted, and considering their benefits and merits, EPA has decided not to adopt the two proposed amendments. Each amendment is addressed separately below.

ASTM D2824

ASTM D2824 provides a less costly alternative to testing solar reflectance, however the test method is primarily relevant to aluminized roof coatings. This product is just one of several types covered by the Program. In designing the Program test methods, EPA went to great lengths to be technology-neutral, and provide the same opportunities for all manufacturers. Because not all manufacturers would be able to test their products for solar reflectance at the same low cost, EPA will not adopt the ASTM D2824 test method at this time.

Accelerated Weathering

Although accelerated weathering is reproducible, controlled, and provides an opportunity for products to qualify more quickly, it does not fully capture the environmental impacts of exposure to the natural elements. In addition, accelerated weathering can overstate the product's ability to maintain performance and function when compared to actual field results.

Although EPA is interested in seeing more products qualify for the ENERGY STAR[®] label, it will not compromise the integrity of the label – and the quality of product that carry it. EPA attempts to be more conservative rather than adopting methods that might over-state product performance. Finally, several individuals stated that one strength of the ENERGY STAR[®] Roof Products Program, in its current state, is the requirement for in-field testing, something rare in the roofing industry. For all of these reasons, EPA chooses not to adopt accelerated weathering at this time.

We would like to extend our thanks and appreciation to members of RCMA for taking the time to submit the above-mentioned proposals, as well as to those whom participated in the February meeting and submitted comments. The ENERGY STAR Programs are based on partnerships that encourage new ideas that will help the Programs evolve over time. The presentation and discussion of the RCMA proposals illustrates that there is opportunity to raise new ideas and engage in open discussion. EPA looks forward to working with you on future developments with the ENERGY STAR[®] Roof Products Program.

If you have any questions, please contact Rachel Schmeltz (schmeltz.rachel@epa.gov) or Steve Ryan (ryan.steven@epa.gov).